

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:** : **Chapter 11**  
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**GENERAL MOTORS CORPORATION, et** : **Case No. 09-50026 (REG)**  
**al.,** :   
:   
:   
**Debtors.** X  
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**MOTION FOR ADMISSION TO PRACTICE, *PRO HAC VICE***

I, Roger Frankel, request admission, *pro hac vice*, before the Honorable Robert E. Gerbger, to represent the Unofficial GM Dealers Committee<sup>1</sup>, a group of creditors and parties-in-interest in the above referenced case.

I certify that I am a member in good standing of the bar of the District of Columbia and the bar of the U.S. District Court for the District of Columbia and the U.S. District Court for the District of Maryland.

I have submitted the filing fee of \$25.00 with this motion for *pro hac vice* admission.

Dated: June 1, 2009  
New York, New York

/s/ Roger Frankel  
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<sup>1</sup> The Unofficial GM Dealers Committee (the “**Dealer Committee**”) was formed prior to the Petition Date by the GM National Dealer Council (the “**NDC**”) in coordination with the National Automobile Dealers Association (“**NADA**”). The NDC’s dealer members, consisting of 15 GM dealers elected by all GM dealers, serve as liaisons with GM on virtually all matters pertaining to the sale and servicing of GM vehicles and represent the interests of the more than 6,000 GM dealers throughout the United States. The NDC formed the Dealer Committee, and retained counsel, to be a voice for the dealer body’s collective interests in connection with GM’s restructuring efforts. The members of the Dealer Committee, who collectively sell and service vehicles under a variety of GM brands in locations all over the country, are Ballweg Automotive Group, Bradshaw Automotive Group, Inc., Dudley Martin Chevrolet (whose principal is the NADA representative to the NDC), Hudson Pontiac Buick GMC Truck, Inc., Paddock Chevrolet, Inc. (whose principal is the Chair of the NDC), and Ron Tonkin Dealership (whose principal is the Vice-chair of NADA). NADA serves as an *ex officio* member of the Dealer Committee.